

# **EXHIBIT 8**



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February 24, 2025

***Via Email***

Johan Conrad, Esq.  
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Re: *In re: Insulin Pricing Litigation*  
Civil Action No. 2:23-md-03080 (BRM) (RLS)

Dear Mr. Conrad:

As you know, this firm represents Compass Lexecon LLC (“Compass”) in connection with the third-party subpoena served on October 7, 2024 by Plaintiffs the States of Arizona, Arkansas, Illinois, Indiana, Kansas, Kentucky, Louisiana, Mississippi, Montana, Oklahoma, and Utah (collectively, the “State AG Plaintiffs”) in the above-referenced matter (the “MDL”) (the “Subpoena”). This letter serves as Compass’s separate response to Plaintiffs’ questions in their January 31, 2025 email relating to the Subpoena.

As the PBMs explained in their February 21, 2025 letter, the PBMs retained Compass as a consultant at the direction of counsel and in anticipation of litigation. As such, and as we have previously explained to you including during our January 31 meet and confer, Compass will not waive any applicable privilege—work-product, attorney-client or otherwise—over the PBMs’ objections. Accordingly, Compass joins in the PBMs’ assertion of privilege over each category of documents addressed in the PBMs’ February 21 letter.

In addition, after the January 31 meet and confer, Compass looked into the burden of producing the requested Confidential data. Because of the way that Compass received the underlying data from the PBMs, it will likely be a time consuming and expensive process to produce responsive documents and data. But without specific requests from Plaintiffs, Compass cannot provide a precise estimate. If Plaintiffs identify particular data or categories of information, Compass can attempt to quantify any associated burden.

Finally, Compass reiterates its objections from its November 20, 2024 Responses and Objections to the Subpoena and expressly reserves all rights.

Johan Conrad, Esq.  
February 24, 2025  
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Very truly yours,

*/s Matthew E. Beck*

Matthew E. Beck  
Member

MB:rms